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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

JESUS RODRIGUEZ
(a/k/a "Chewy"),

Defendant.

Case No. **2:19-CR-74-WFN**

INDICTMENT

Vio: 18 U.S.C. § 2422(b):
Online Enticement of a Minor
(Count 1)

18 U.S.C. § 1591(a)(1), (b)(2):
Child Sex Trafficking
(Count 2)

18 U.S.C. § 2252A(a)(2)(A), (b)(1):
Receipt of Child Pornography
(Count 3)

18 U.S.C. §§ 2428, 1594, 2253:
Forfeiture Allegations

The Grand Jury charges:

COUNT 1

Beginning on or about December 16, 2016, and continuing until on or about December 17, 2016, in the Eastern District of Washington and elsewhere, the Defendant, JESUS RODRIGUEZ (a/k/a "Chewy"), did unlawfully and knowingly

1 use a facility and means of interstate and foreign commerce, namely, the Internet,
2 to persuade, induce, entice, and coerce an individual who had not yet attained the
3 age of 18 years, to wit, Minor Victim 1, to engage in sexual activity for which a
4 person can be charged with a criminal offense, including WASH. REV. CODE
5 § 9A.44.079, Rape of a Child in the Third Degree; all in violation of 18 U.S.C.
6 § 2422(b).
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COUNT 2

On or about December 17, 2016, in the Eastern District of Washington and
elsewhere, the Defendant, JESUS RODRIGUEZ (a/k/a “Chewy”), in and affecting
interstate commerce, and having had a reasonable opportunity to observe Minor
Victim 1, knowingly, recruited, harbored, transported, provided, obtained,
advertised, maintained, patronized, and solicited Minor Victim 1, knowing and in
reckless disregard of the fact that Minor Victim 1 had not attained the age of 18
years and would be caused to engage in a commercial sex act, all in violation of
18 U.S.C. § 1591(a)(1), (b)(2).

COUNT 3

Beginning on or about January 8, 2017, and continuing until on or about
January 14, 2017, in the Eastern District of Washington and elsewhere, the
Defendant, JESUS RODRIGUEZ (a/k/a “Chewy”), did knowingly receive child
pornography, as defined in 18 U.S.C. § 2256(8)(A), that had been mailed, shipped
and transported in interstate commerce by any means, including by computer, to
wit: images depicting minor children engaging in sexually explicit conduct,
including but not limited to the lascivious exhibition of the genitals and pubic area,
in violation of 18 U.S.C. § 2252A(a)(2)(A), (b)(1).

1 NOTICE OF FORFEITURE ALLEGATIONS

2 The allegations contained in this Indictment are hereby realleged and
3 incorporated by reference for the purpose of alleging forfeitures pursuant to 18
4 U.S.C. §§ 2428, 1594, and 2253.

5 Pursuant to 18 U.S.C. § 2428, upon conviction of an offense in violation of
6 18 U.S.C. § 2422, as charged in Count 1 of this Indictment, the Defendant, JESUS
7 RODRIGUEZ (a/k/a "Chewy"), shall forfeit to the United States of America any
8 property, real or personal, that was used or intended to be used to commit or to
9 facilitate the commission of the offense and any property, real or personal,
10 constituting or derived from any proceeds obtained, directly or indirectly, as a
11 result of the offense. The property to be forfeited includes, but is not limited to: a
12 black Samsung Galaxy S7 cellular telephone, model number SM-G930R, serial
13 number 089557555906574899.
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15 Pursuant to 18 U.S.C. § 1594, upon conviction of an offense in violation of
16 18 U.S.C. § 1591, as charged in Count 2 of this Indictment, the Defendant, JESUS
17 RODRIGUEZ (a/k/a "Chewy"), shall forfeit to the United States of America any
18 property, real or personal, that was used or intended to be used to commit or to
19 facilitate the commission of the offense and any property, real or personal,
20 constituting or derived from any proceeds obtained, directly or indirectly, as a
21 result of the offense. The property to be forfeited includes, but is not limited to: a
22 black Samsung Galaxy S7 cellular telephone, model number SM-G930R, serial
23 number 089557555906574899.
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25 Pursuant to 18 U.S.C. § 2253, upon conviction of an offense in violation of 18
26 U.S.C. § 2252A(a)(2), (b)(1), as alleged in Count 3 of this Indictment, the Defendant,
27 JESUS RODRIGUEZ (a/k/a "Chewy"), shall forfeit to the United States of America
28 any visual depiction described in section 2252A of that chapter, or any book,
magazine, periodical, film, videotape, or other matter which contains any such visual

1 depiction, which was produced, transported, mailed, shipped or received in violation
2 of this chapter; any property, real or personal, constituting or traceable to gross
3 profits or other proceeds obtained from such offenses; and, any property, real or
4 personal, used or intended to be used to commit or to promote the commission of
5 such offenses, or any property traceable to such property. The property to be
6 forfeited includes, but is not limited to: a black Samsung Galaxy S7 cellular
7 telephone, model number SM-G930R, serial number 089557555906574899.
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9 If any of the property described above, as a result of any act or omission of
10 the Defendant:

- 11 a. cannot be located upon the exercise of due diligence;
- 12 b. has been transferred or sold to, or deposited with, a third party;
- 13 c. has been placed beyond the jurisdiction of the court;
- 14 d. has been substantially diminished in value; or
- 15 e. has been commingled with other property which cannot be divided
16 without difficulty;

17 the United States of America shall be entitled to forfeiture of substitute property
18 pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), 18 U.S.C.
19 § 2253(b).

20 DATED this 16 day of April, 2019.

21 A TRUE BILL

22 
23 Foreperson

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25 Joseph H. Harrington
26 United States Attorney

27 
28 David M. Herzog
Assistant United States Attorney